

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS AND VERIZON CORPORATE
SERVICES GROUP INC.,

Defendants.

Case No. 2:23-cv-00352-JRG-RSP

JURY TRIAL DEMANDED

**PLAINTIFF HEADWATER RESEARCH LLC'S UNOPPOSED MOTION TO
EXPEDITE BRIEFING ON HEADWATER'S MOTION TO RECONSIDER PARTIAL
DENIAL OF MOTION FOR LEAVE TO SUPPLEMENT EXPERT REPORTS
BASED ON NEWLY PRODUCED DISCOVERY (DKT. 353)**

Plaintiff Headwater Research LLC (“Headwater”) respectfully moves to expedite briefing on its concurrently filed Motion to Reconsider Partial Denial of Motion for Leave to Supplement Expert Reports Based on Newly Produced Discovery (Dkt. 353) (“Motion to Reconsider”). Defendants do not oppose this motion to expedite briefing but do oppose the Motion to Reconsider.

On June 20, 2025, the Court issued a Memorandum Order granting in part and denying in part Headwater’s request for leave to supplement expert reports. Dkt. 347. As explained in its concurrently filed Motion to Reconsider, Headwater respectfully requests that the Court reconsider the portions of the Memorandum Order denying Headwater’s requests for leave to supplement.

Because the Memorandum Order impacts the parties’ trial preparations and jury selection is scheduled to begin on July 7, 2025, Headwater respectfully seeks expedited briefing on Headwater’s Motion to Reconsider. Defendants confirmed they would agree to an opposition deadline of July 1, 2025, so long as Headwater files its Motion to Reconsider by noon CT on June 25, 2025, which Headwater has done. The parties also agreed that Headwater’s opening brief would be limited to four pages, that Defendants’ responsive brief would be limited to four pages, and that no replies or sur-replies would be submitted.

Accordingly, Headwater respectfully requests—and Defendants do not oppose—that the Court enter an Order shortening the briefing schedule as follows:

1. Defendants’ opposition to Headwater’s Motion to Reconsider is due on or before July 1, 2025, and is limited to no more than four pages in length.
2. No further briefing is permitted.

Dated: June 25, 2025

Respectfully submitted,

/s/ Reza Mirzaie

Marc Fenster

CA State Bar No. 181067
mfenster@raklaw.com
Reza Mirzaie
CA State Bar No. 246953
rmirzaie@raklaw.com
Brian Ledahl
CA State Bar No. 186579
bledahl@raklaw.com
Ben Wang
CA State Bar No. 228712
bwang@raklaw.com
Adam Hoffman
CA State Bar No. 218740
Email: ahoffman@raklaw.com
Dale Chang
CA State Bar No. 248657
dchang@raklaw.com
Paul Kroeger
CA State Bar No. 229074
pkroeger@raklaw.com
Neil A. Rubin
CA State Bar No. 250761
nrubin@raklaw.com
Kristopher Davis
CA State Bar No. 329627
kdavis@raklaw.com
James S. Tsuei
CA State Bar No. 285530
jtsuei@raklaw.com
Philip Wang
CA State Bar No. 262239
pwang@raklaw.com
James Milkey
CA State Bar No. 281283
Email: jmilkey@raklaw.com
Jason M. Wietholter
CA State Bar No. 337139
jwietholter@raklaw.com
James Pickens
CA State Bar No. 307474
Email: jpickens@raklaw.com
Qi (Peter) Tong
TX State Bar No. 24119042
Email: ptong@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Fl.

Los Angeles, CA 90025
Telephone: 310-826-7474

Andrea L. Fair
TX State Bar No. 24078488
MILLER FAIR HENRY PLLC
1507 Bill Owens Parkway
Longview, Texas 75604
Telephone: 903-757-6400
andrea@millerfairhenry.com

*Attorneys for Plaintiff,
Headwater Research LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on June 25, 2025.

/s/ Reza Mirzaie
Reza Mirzaie

CERTIFICATE OF CONFERENCE

Although this motion is exempt from the Court's meet-and-confer requirement, I hereby certify that counsel for Headwater nonetheless conferred with counsel for Defendants on June 24, 2025. Defendants oppose this motion.

/s/ Reza Mirzaie
Reza Mirzaie